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January 17, 2025

Via ECF

United States District Court
Eastern District of New York
Attn: Hon. James M. Wicks, U.S.M.J.
100 Federal Plaza, Courtroom 1020
Central Islip, New York 11722

Re: Superb Motors, et. al. v. Deo, et. al.
Case No.: 2:23-cv-6188 (JMW)

Dear Judge Wicks:

The undersigned represents the Deo Defendants in the above-referenced matter. Pursuant to Your Honor's January 10, 2025 Order (ECF No. 215), the Deo Defendants were granted permission to relocate the six (6) Deo Injuncted Vehicles currently stored at Luxsport to the dealership lot operated by Gold Coast Motors of Syosset, LLC ("GCM") at 108 New South Street, Hicksville, NY on or before January 17, 2025, with written notice to the Superb Plaintiffs' counsel following such relocation.

On Tuesday, January 14, 2025, the Superb Plaintiffs' counsel raised concerns regarding the adequacy of the policy limits for the insurance coverage at the GCM lot and requested to meet-and-confer with the Deo Defendants concerning this issue. To address these concerns, the Deo Defendants have agreed to obtain an umbrella insurance policy to provide additional coverage before relocating the vehicles.

Accordingly, we respectfully request that the Court extend the deadline to relocate the Deo Injuncted Vehicles until after the umbrella insurance policy is obtained. The Deo Defendants will provide a copy of the certificate of insurance for the umbrella policy to the Superb Plaintiffs prior to relocating the vehicles. Thereafter, they shall notify the Superb Plaintiffs' counsel in writing no later than twenty-four (24) hours following the relocation of the vehicles to the GCM lot as required by this Court's Order dated January 10, 2025. See ECF Docket Entry 215.

This request is made in good faith to ensure compliance with the Order and to address the Superb Plaintiffs' counsel's concerns. The extension will not prejudice any party and will provide assurance that all parties' interests are adequately protected. The Superb Plaintiffs consent to this request without prejudice to their rights upon review of the new insurance certificates.



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We thank the Court for its attention to this matter.

Dated: Hicksville, New York
January 17, 2025

s/ Brian M. Levine
Brian M. Levine